

DEPARTMENT OF AGING

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June 30, 2008

Victoria Jump, Director
Ventura County Area Agency on Aging
646 County Square Drive, Suite 100
Ventura, California 93003

Dear Ms. Jump:

Enclosed is the final report issued by the California Department of Aging (CDA), which summarizes the onsite comprehensive assessment of the Ventura County Area Agency on Aging (VCAAA) for Planning and Service Area (PSA) 18. CDA staff conducted the assessment from February 25-28, 2008. The purpose of the assessment was to review the Administrative, Fiscal, and Program components of your direct and contracted Title III/VII, Title III E, Title V, HICAP, and Community-Based Services Programs (CBSP).

The format of the report contains four specific sections that include: Recap/Overview of Monitoring Visit, Best Practices or Models of Service Delivery, Technical Assistance, and Findings and Corrective Actions.

On April 18, 2008, CDA sent VCAAA a Report of Findings and Corrective Actions and a Corrective Action Plan (CAP) in an electronic format requesting VCAAA, within 30 days, to identify the actions it planned to implement to ensure substantial compliance with all statutory language and program standards that were identified in the CAP. We are currently reviewing the submitted CAP and will notify VCAAA when the review is complete, if any additional actions are required, or if the CAP is approved as submitted.

We would like to thank you, your staff, the Chair of the Governing Board, and the Chair of the Advisory Council for all the assistance and hospitality during our visit. For your convenience we have enclosed two copies of this report. Please provide a copy to your Governing Board Chair and your Advisory Council Chair.

CDA will conduct a comprehensive assessment of your agency again in 2012. In the meantime, please do not hesitate to contact us should you or your staff have questions regarding the administration of programs funded through the Older Americans Act or Older Californians Act.

Sincerely,

Geri Baucom, Acting Policy Manager
Monitoring Protocol Team

Enclosures

cc: Peter C. Foy, Chair, Governing Board

Tony Bellasalma, Chair, Advisory Council

Lynn Daucher, Director
California Department of Aging

Edmond P. Long, Acting Deputy Director
Long-Term Care and Aging Services Division

**VENTURA COUNTY
AREA AGENCY ON AGING
PSA 18**

**REPORT OF THE
COMPREHENSIVE ASSESSMENT VISIT**

**Conducted by the
California Department of Aging
February 25-28, 2008**

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- **Recap/Overview of Monitoring Visit**
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The onsite assessment of the Ventura County Area Agency on Aging (VCAAA) was conducted by staff of the California Department of Aging (CDA) from February 25-28, 2008. Staff present were Geri Baucom, Acting Policy Manager and Coach, Fiscal and Contracts; and Program Specialists, Sandi Hartsock and Tasha Wilson (Administrative); Mark S. Meis (Data Reporting); Anthony Perez (Fiscal); Denny Wight (Title III B Supportive Services); Scott Crackel (Title III B Information and Assistance and Disaster Preparedness); Kathleen Hendrickson (Title III B Case Management and Adult Day Care, Alzheimer's Day Care Resource Center, and Linkages); Barbara Estrada and Margaret Stahler (Elderly Nutrition Program, Title III D Disease Prevention and Health Promotion, Brown Bag, and Senior Nutrition Farmers Market); Joel Weeden (Title III E Family Caregiver Support Program); Mary Pynn (Title V Senior Community Service Employment Program); and Ross Kaplan (Health Insurance Counseling and Advocacy Program). CDA staff monitored administrative, fiscal, and specific program standards required by the Older Americans Act (OAA) and Older Californians Act (OCA).

Throughout the report we use either VCAAA or AAA to refer to Ventura County Area Agency on Aging. In every instance, the two terms are synonymous.

This report includes:

- Recap of the standards monitored during the visit.
- Recognition of best practices or models of service delivery discovered during the monitoring visit that will be shared with the aging network by posting a notice on CDA's website.
- Documentation of the technical assistance on specific program standards provided to the AAA during the monitoring visit.
- Findings and Corrective Actions.

RECAP/OVERVIEW OF MONITORING VISIT

This section provides a recap of the standards monitored during the visit and the recognition of the AAA staff that assisted CDA to accomplish its work.

AAA Administrative Review

Governing Board

Planning and Service Area (PSA) 18 is made up of a single county which consists of ten incorporated cities. Ventura County borders Santa Barbara County, Kern County, and Los Angeles County. The Ventura County Area Agency on Aging (VCAAA) is organized as a public agency that functions under the Ventura County Board of Supervisors. The Board of Supervisors has local policy making authority over the AAA; they appoint the Director and give final approval to the budget, Area Plan, and programs proposed for funding.

Geri Baucom and Sandi Hartsock met with Linda Catherine Le, Management Analyst, County Executive Office (CEO), and Victoria Jump, AAA Director, to determine if the Governing Board, as the policy-making body of the AAA, recognizes and fulfills its roles and responsibilities as required by all regulations, laws, and contracts. The Board is attuned to the local community and is aware that the Advisory Council is the advocate for the seniors through the VCAAA. Any issues for the Board of Supervisors go through the CEO's office for review and questions prior to being placed on the agenda; usually within ten days. The Governing Board, Advisory Council, and VCAAA have a good working relationship, and the Board is confident that the VCAAA is the right advocate for seniors in Ventura County.

Advisory Council

Geri Baucom and Sandi Hartsock met with Tony Bellasalma, Advisory Council Chair, and Victoria Jump, AAA Director, to determine if the Advisory Council is provided the opportunity to (1) advise the AAA on all matters related to the development and administration of the Area Plan and all operations conducted under the plan, and (2) further the AAA's mission of developing a community-based system of care for older persons living within the PSA. Mr. Bellasalma has been a member of the Council for over ten years. The Advisory Council meets seven times a year and has a waiting list of people that would like to join. The last time seats were available, over 40 people applied. The Advisory Council members developed a monitoring tool and assist with monitoring the service providers. In addition, members work on committees, organize and hold Public Hearings, and make recommendations on how to spend One-Time-Only money received by the VCAAA. The Advisory Council has a good working relationship with the VCAAA.

Staffing and Organization

Tasha Wilson met with Victoria Jump, AAA Director, and Melvin Siazon, Fiscal Officer, to determine if the AAA has an adequate number of trained staff to administer programs to

older individuals living within the PSA. Ms. Wilson reviewed duty statements, a desk manual, and the Personnel Procedures Manual and determined that personnel practices and procedures have been established and are well maintained. Staff attends mandated training throughout the year and has the opportunity to attend job-related training and conferences such as C4A. Requests for additional training, such as time management or supervisor training, are supported and approved by the AAA Director.

Procurement/Contract Process

Sandi Hartsock met with Christine Voth, Grants and Planning Manager, to determine if the AAA has established systematic procedures for the award and administration of contracts in the Area Plan and to ensure VCAAA awarded contracts through an open and competitive process. All documentation for this standard was reviewed. The latest RFP was issued in May 2007 for Title III B and Title III E. VCAAA's RFP contained most of the required elements. There were no grievances or appeals filed as a result of the RFP process.

Area Plan Achievement

Tasha Wilson met with Victoria Jump, AAA Director, and Christine Voth, Grants and Planning Manager, to determine if the AAA has a process for monitoring and tracking the progress of goals and objectives in the current approved Area Plan. The AAA has a running computerized list to track the progress of their goals and objectives. There is also a white board in Ms. Jump's office used to track current activities. At monthly staff meetings, goals and objectives are discussed with particular emphasis on PD or C activities, and the Area Plan Committee meets once a month with the Advisory Council to give a status report and present any issues affecting the Area Plan.

Targeting/Needs Assessment

Tasha Wilson met with Victoria Jump, AAA Director, and Christine Voth, Grants and Planning Manager, to determine if VCAAA conducts a needs assessment once every four years and targets services to older individuals with the greatest economic or social needs with particular attention to low-income, minority individuals who live within the PSA. A needs assessment was conducted in 2007 of 1,800 Brown Bag recipients and 577 home-bound seniors receiving home-delivered meals. The surveys were available in both English and Spanish. Of the 2,377 surveys distributed, 900 were returned. The needs identified included dental, vision, and hearing care; transportation; and utility and energy costs. VCAAA also surveyed Service Provider Organizations, senior centers, and other leading organizations that serve seniors. Of 43 surveys distributed, 27 were returned and the top three needs identified were transportation, family caregiver respite, and in-home services. VCAAA also collaborated with the Rainbow Alliance to do a Lesbian, Gay, Bisexual, and Transgender (LGBT) survey and is working with the CEO to assess family caregivers using the "Survey Monkey" (an online survey tool). VCAAA has an efficient method for assessing needs and uses the identified needs to develop area plan goals and objectives.

Community-Based Services

Tasha Wilson met with Victoria Jump, AAA Director, and Christine Voth, Grants and Planning Manager, to ensure the AAA proactively provides leadership in the development of a comprehensive and coordinated community-based system of services within the PSA. VCAAA has a long history of partnering with a variety of organizations throughout Ventura County to provide specialized services to seniors. In November 2007, VCAAA collaborated with the Alzheimer's Association to sponsor a memory screening on "National Members Screening Day." The Advisory Council's Baby Boomer Committee also collaborated with AARP to hold a Wine and Cheese Social to reach the targeted Baby Boomer population in July 2007. VCAAA is well known in the community through events such as the Countywide Senior Expo, Health Fairs, and HICAP events. In an attempt to verify that the community is aware of the VCAAA, a question was added to their survey that asks "Have you heard of the Ventura County Area Agency on Aging?" Over the last few years VCAAA has noticed more and more people responding "yes" to this question.

Management of Service Providers

Sandi Hartsock met with Christine Voth, Grants and Planning Manager, to determine if the AAA effectively communicates with, disseminates policies to, and monitors its service providers. VCAAA has an extensive communication system with the service providers in Ventura County. The VCAAA considers service providers their partners and meet quarterly. During the January and June meetings the agenda is to discuss anything new from CDA and review the Contractors Manual page by page. VCAAA holds technical assistance workshops on the donation policy and also reviews the policy during monitoring. Ms. Voth reviews quarterly fiscal and data reports to identify any red flags regarding service provider activity levels. This quarterly review allows VCAAA to proactively discuss issues with service providers and determine how they can assist in achieving their goals. VCAAA has a communication system that works well with their service providers.

Data Reporting

Mark S. Meis met with Victoria Jump, AAA Director, Martin Marquez, IT/Data, and Christine Voth, Grants and Planning Manager, to ensure data reporting processes are in place at all levels in order to improve quality. Mr. Meis discussed policies and procedures the Agency uses for program data collection and reporting. VCAAA uses "Q" Care Access software for data collection and reporting. Service providers are required to input their data directly into this database. Although VCAAA reports data to CDA in a timely manner, program staff are not reviewing the accuracy of the data prior to submission.

AAA Fiscal Review

Anthony Perez and Geri Baucom met with Melvin Siazon, Fiscal Officer, to ensure VCAAA maintains a financial reporting system that reflects accurate, current, and complete disclosure of the financial activities of the AAA and its service providers. Mr. Perez and Ms. Baucom conducted a limited review of the AAA's fiscal operations as Mr. Siazon was recently hired and was not familiar with the AAA's fiscal systems. As

noted in the Findings Requiring Corrective Action, some documentation reviewed did not support reported expenditures; however, originating Title V invoices did agree with reported expenditures.

Specific Program Reports—Older Americans Act Programs

Title III B—Supportive Services (General)

Denny Wight met with Christine Voth, Grants and Planning Manager, to review the Title III B Monitoring Tool completed prior to the onsite assessment. The major areas discussed included the development of community-based services, program operations, and administrative programmatic procedures. VCAAA maintains proper documentation for its Title III B operations.

Mr. Wight also visited the City of Oxnard R.S.V.P., with whom the AAA contracts for Title III B Physical Fitness to operate the Bone Builders Program. The Bone Builders Program is a light-weight training and exercise program designed to increase bone density and prevent osteoporosis. Mr. Wight met with Mary Sue Eastlake, R.S.V.P. Director, to discuss the operation of the program and review samples of files containing back-up documentation for units of service reported to VCAAA.

Title III B—Information and Assistance (I&A)

Scott Crackel and Denny Wight conducted an assessment of the I&A program by reviewing the monitoring tool and related documents with Christi Cantrell, I&A Program Specialist, and Liz Renteria, Grants and Planning Program Assistant. The AAA is the direct provider of I&A services for Ventura County. Mr. Crackel reviewed the non-computerized I&A log-in and the follow-up management systems.

Mr. Crackel also met with Victoria Jump, AAA Director, and Susan White, Senior Nutrition Program Manager, to discuss the Emergency and Disaster Preparedness Plan. Mr. Crackel and Mr. Wight reviewed the I&A/Emergency and Disaster Preparedness training plan and The Ventura County Senior Services Directory.

Title III B—Case Management

Catholic Charities of Los Angeles, Inc., and Older Adult Services and Intervention (OASIS) in Camarillo are the service providers for Title III B Case Management services for Ventura County. Services are provided to seniors 60 and older, in the Camarillo, Moorpark, and Ventura areas. Catholic Charities has many funding sources allowing them to provide services to approximately 863 clients.

Kathleen Hendrickson reviewed the contract, the AAA Case Management program monitoring, and the CDA Case Management monitoring tool. The most current monitoring of the program was conducted during the week of February 18, 2008, by Christine Voth, Grants and Planning Manager. Ms. Voth used the AAA's Project Assessment Monitoring tool to monitor the program; however, the monitoring report had not been completed at the time of this visit.

One care manager is assigned to the Case Management caseload. The Case Management Care Manager performs the initial assessment and care plan and arranges services for clients. The client receives a yearly reassessment and the case remains open so the client has a contact if their circumstances change or they need additional assistance.

Kathleen Hendrickson met with Pat Esseff, Regional Coordinator, and her assistant, Linda Esparza, at their office in Camarillo. OASIS Case Management has two very small offices at St. Mary Magdalen Church. Ms. Esseff has other duties in addition to the Case Management program and will be hiring a program coordinator for the Case Management program in the near future.

Catholic Charities has chosen to obtain accreditation through the Council on Accreditation for their Case Management services, and their accreditation was recently renewed. As part of the process a Catholic Charities employee with a Ph.D. provides quality assurance for the program; reviewing charts and providing training for staff.

Title III C—Elderly Nutrition Program (ENP)

Barbara Estrada, Registered Dietitian (R.D.), and Margaret Stahler, R.D., conducted an assessment of the VCAAA ENP with Patti Jaeger, AAA R.D., and Susan White, Senior Nutrition Program Manager. Ms. Estrada reviewed the Contractors Manual, the Senior Nutrition Program Handbook, donation requests, current ENP menu compliance with Dietary Reference Intakes, home-delivered meals policies and procedures, annual monitoring reports, quarterly staff training, nutrition education topics, and the ENP monitoring tool. Three site visits were conducted to: The Oxnard Wilson Center, The Help of Ojai Center, and Food Share, Inc. Meal time was observed at the senior nutrition program centers.

The Wilson Center serves frozen ConAgra entrées and vegetable choices selected by the AAA R.D. for acceptability and low sodium content. The ENP frozen food purveyor is Jordano's, a local company. This company is especially helpful to obtain additional components of the senior meals such as the whole grain bread that is served. The AAA ENP and Jordano's have an excellent working relationship. All meals are served with whole grain bread, butter, fresh fruit, mixed green salad, low fat or nonfat milk, and either yogurt or a cheese stick.

The Help of Ojai Center has a small production kitchen where meals are prepared daily. The meals are served with milk, butter, and cheese sticks. Because of the funding shortfalls of recent years, the Help of Ojai Center obtains as much food from Food Share as possible.

Food Share, Inc., Ventura County's food bank that provides storage and pack out for the frozen home-delivered meals for the ENP, was reviewed with Lance Ferguson, Senior Nutrition Program Coordinator. Food Share has two large warehouses. One warehouse has areas for pack out of the home-delivered meals and sorting of fresh and

packaged donations and a large refrigerator and freezer with drive in capacity. The other warehouse is used for storage. The areas were clean and well organized.

Included with the frozen home-delivered meals are fresh fruits and vegetables, milk, and whole grain bread. This frozen meal program was developed after the previous hot home-delivered meal program lost county funding. Ventura County has developed an excellent program with very limited funds.

Title III D—Disease Prevention and Health Promotion

Barbara Estrada R.D., and Margaret Stahler R.D., met with Victoria Jump, AAA Director, to discuss the Disease Prevention and Health Promotion Program. VCAAA provides several services to seniors both as direct and contracted services. Patti Jaeger, AAA R.D., provides individual nutritional counseling for seniors at each of the nutrition sites. Follow-up is provided on a quarterly basis as needed. VCAAA contracts with the County of Ventura Fire Department to provide the “Fires and Falls Prevention” program. The Fire Department speaks on falls prevention at the senior centers, provides smoke alarms, and changes the batteries of smoke alarms in people’s homes. The battery changing service was started due to an analysis of 911 calls which showed that a large percentage of falls occurred when a senior was attempting to change the batteries in their smoke alarms. VCAAA is considering contracting for an evidence based falls prevention program called “A Matter of Balance” in the future.

The AAA’s medication management services include providing a “File of Life” in English or Spanish, pill boxes to help seniors organize their medications, and a medication guide that reminds seniors of medications to discuss with their doctors.

Senior Farmers Market Nutrition Program (SFMNP)

Barbara Estrada and Margaret Stahler met with Patti Jaeger, AAA R.D. A review of all elements of the SFMNP were found to be complete and organized. Each of the required USDA race and ethnicity categories and instructions for self identifying were presented to the seniors to fill in. The data was complete except when seniors chose not to self identify or did not follow instructions.

Title III E—Family Caregiver Support Program (FCSP)

As the newest program to be incorporated into the OAA, FCSP is still continuing a strong ramp-up phase for evolving comprehensive, coordinated, and cost-effective systems to help minimize the negative emotional, physical, and financial consequences of unpaid family caregiving. Title III E federal funds are intended for use as a catalyst by AAAs in generating local capacity to address this need. The VCAAA aging services network has evolved several highly effective approaches for reaching out to these fragile family support networks.

Joel Weeden’s review focused on the AAA’s technical and oversight role for both the direct delivery and contracted procurement of FCSP services. As the CDA-assigned lead analyst for VCAAA’s Area Plan approval process, Mr. Weeden has worked closely over the past four years with Christine Voth, Grants and Planning Manager. She also

serves as the AAA point person for all issues related to FCSP. Therefore, he came into the review with an established understanding of the excellent AAA processes for FCSP planning and service provider selection.

This review provided Mr. Weeden the unique opportunity to visit three different types of FCSP service providers, all having close affiliations with the local formal health and long-term care delivery systems. Scheduling conflicts prevented Ms. Voth from collaborating in the field reviews. However, her assistant, Elizabeth Renteria, accompanied Mr. Weeden during the following meetings:

- Long Term Care Services of Ventura County, Inc. – A lively discussion was held with Sylvia Taylor Stein, Executive Director and Local Ombudsman Coordinator. Mr. Weeden at one time served as the State Ombudsman Consultant for this agency. The visit focused on the expanded range of caregiver support being provided through the FCSP funding, performance accountability expectations specific to FCSP funding, and the possibility of presenting the agency's collaborative FCSP-Ombudsman approach at a future State Ombudsman Annual Training Conference.
- Gold Coast CareGivers (Livingston Memorial VNA Health Corporation) – Review of FCSP service components was conducted with Lynn Martson, Gold Coast CareGivers, Director, and her officer manager, John Macias. The discussion covered: a) ways to distinguish free OAA services offered to families from the other extensive array of VNA services, b) exploration of the OAA intent for flexible and timely service response in order to prevent a collapse of fragile unpaid family care, and c) confusion over the dichotomous use of "caregiver" within an agency that arranges for *paid or formal* caregivers to go into the homes of family caregivers. In addition, Mr. Weeden had the opportunity to talk with Geriatrician Dr. Lanyard Dial, VNA President/CEO and Medical Director, about the complex changes taking place in the long-term care policy environment and their impact on the family caregiving role.
- Paul Furtaw (sole owner and licensed Framing and Rough Carpentry Contractor) – The overview conducted at the AAA offices addressed the unique challenges experienced by a for-profit entity that becomes a service provider for FCSP services. Mr. Furtaw is one of two individuals that received a Minor Home Modification services contract for Title III E eligible family caregivers to help facilitate and enhance the unpaid caregiving role. He provides his services under the program name Home Remedies. Discussion focused on the additional performance accountability processes that are needed for an oversight agency to ensure compliance with federal and State requirements. Mr. Furtaw has evolved a service approach for effectively responding on a timely basis to multiple acute care discharge and case management-related needs for

immediate minor home modifications so that loved ones can meet critical home care responsibilities.

The field visit discussions revealed significant differences between targeted service specifications found in the AAA contract procurement process and flexible multifaceted performance approaches being utilized by FCSP service providers. These distinctions and AAA/service provider performance accountability needs were reviewed in a follow-up session with Victoria Jump, AAA Director. Ms. Jump was also asked about the tracking and allocation procedures followed by the AAA for direct delivery of FCSP Caregiver Outreach and Caregiver I&A services in collaboration with similar Title III B services.

Title V—Senior Community Services Employment Program

Mary Pynn met with Christine Voth, Grants and Planning Manager, Frances Trujillo, SER Jobs for Progress, Project Coordinator, and Violeta Tobias, Case Manager Trainee, to discuss the project's compliance with SCSEP program standards. Ms. Pynn reviewed participant files, supporting documentation, and the Web-Based Data Collection System (WDCS). Two participants and one host agency supervisor were interviewed. In addition, Ms. Pynn conducted an onsite visit of the Santa Paula One Stop Career Center. During the onsite visit Ms. Pynn conducted program and participant file reviews of both current and exited participants.

Specific Program Reports—Older Californians Act Programs

Health Insurance Counseling and Advocacy Program (HICAP)

Ross Kaplan reviewed the HICAP Monitoring Instrument that was completed prior to the onsite assessment visit. The instrument includes a review of eight core elements: management/personnel/operations; recruitment and recognition of volunteers; training; community education; client counseling; legal; marketing/publicity; and performance reporting. Mr. Kaplan met with Katherine Raley, HICAP Program Manager, to discuss VCAAA's direct HICAP services and to review the HICAP Monitoring Instrument. Ms. Raley provided additional supportive documentation as requested. Mr. Kaplan also reviewed 30 intake/counseling forms for program standards and timeliness of completion.

Alzheimer's Day Care Resource Center (ADCRC)

The AAA contracts with Senior Concerns, Inc., in Thousand Oaks for ADCRC services. This site is licensed as an Adult Day Program. The Center divides their services into three programs: the Funseekers, for persons with mild cognitive impairment; the Fitzgerald Program, for those with moderate cognitive impairment; and the Friendship Program, for those with severe cognitive impairment.

Kathleen Hendrickson visited the Center and was given a tour by Carol Freeman, President, and Maureen Symonds, Director. Each group has their own activity and dining area. There is a large room where all the groups can come together to enjoy visiting entertainers. Ms. Freeman and Ms. Symonds explained that most of their

participants move slowly from one group to another as their memory loss increases. With separate programs, participants are able to participate in activities appropriate to their level of functioning. This site is an excellent example of an innovative Alzheimer's program.

Ms. Hendrickson reviewed the contract and the monitoring of the ADCRC program. The most current monitoring of the program was conducted during the week of February 18, 2008, by Christine Voth, Grants and Planning Manager. The Core Elements list, the Grantee Self Assessment Form (completed by Senior Concerns), and the AAA's Project Assessment tool were used to monitor the program; however, the monitoring report had not been completed at the time of this visit.

Linkages

Kathleen Hendrickson monitored VCAAA's direct Linkages Program by reviewing the Linkages Self Assessment tool and reviewing two client charts; one for an older individual and one for a younger disabled client. The Linkages Program has four Care Managers who have joint caseloads of Linkages and Multipurpose Senior Services Program (MSSP) clients. Each Care Manager has approximately 20 clients.

Ms. Hendrickson met with Monica Neece, Linkages and MSSP Supervising Care Manager, and Victoria Jump, AAA Director, to discuss the Linkages Program. Overall, the documentation was excellent and it was evident that the appropriate services were being provided to clients.

BEST PRACTICES OR MODELS OF SERVICE DELIVERY

Best practices or models of service delivery discovered during the monitoring of AAAs are being identified by the Department to share with the aging network and other agencies or individuals interested in developing senior services in their community.

Listed below are either best practices or models of service delivery identified during the monitoring visit and discussed at the exit conference conducted by CDA. We will place on CDA's website, a reference of your best practices or models of service delivery along with the AAA staff you select to provide guidance to individuals seeking information on specific activities, programs, and services.

Advisory Council

Advisory Council Grantee Site Visit Report Form

Advisory Council members are involved in conducting service provider site visits for VCAAA. The "Advisory Council Grantee Site Visit Report Form" was created by Council members for use during the visits. The form contains a series of 12 questions that include if the service is available elsewhere, if the Board of Directors understands and supports the program, and if the grantee will be able to provide the service at the end of the grant period. The form also requests information about the strengths and weakness of the program. The members, who complete the form, present the information to the Council.

Procurement/Contract Process

Contingency for an Increase or Decrease in Funding Questionnaire in Grants Application

VCAAA's Grant Application has a "Contingency Plan – Funding Increase" page that discusses additional funding which may become available and requests a description of how the additional funds would be used. The next page, "Contingency Plan – Funding Reduction" requests a description of the plan and specifically asks what services would be reduced if there was a reduction in funding. These pages require the service provider to create a plan for both scenarios, and allow the AAA the opportunity to determine how realistic the service provider's plan is.

Contract Language Regarding Voluntary Contribution

VCAAA's contract language included all of the elements that CDA requires regarding voluntary contribution. The language was clear for the service provider to understand and implement.

Community Based System of Services

Inexpensive "Placemat Advertisement" at ENP Meal Sites for Senior Event

As an inexpensive way to advertise, the AAA produced a paper placemat to be used at senior meal sites with information about the upcoming Senior Expo. The placemats were creative and colorful and showed when and where the event was to be held, cost

of admission, and the sponsors for the event. One side of the placemat was available in English and the other side translated into Spanish.

The AAA, in Collaboration with AARP, Holds Boomer Event to Share Information on Available Resources and Services

The Advisory Council's Baby Boomer Committee collaborated with AARP to hold a Wine and Cheese Social in July 2007 to reach the targeted Baby Boomer population. This event allowed information sharing between VCAAA and the Boomer population. The AAA was able to advertise services available within the PSA and Baby Boomers were able to discuss their specific needs. The event was a huge success and the Advisory Council is already in the process of planning their next social.

Title III B—Supportive Services (General)

Grantee Self Assessment Form

VCAAA's service providers complete the Grantee Self Assessment Form prior to the AAA conducting an onsite assessment. The Grantee Self Assessment Form contains 48 questions and is quite inclusive, covering major programmatic and administrative areas, i.e., personnel policies and procedures, service delivery, budgeting, etc. It provides an excellent basis for onsite monitoring visits and can be a helpful addition to any AAA's monitoring procedures.

Title III C—Elderly Nutrition Program (ENP)

Refusal of Service to Eligible Senior Memo

VCAAA developed a "Refusal of Service to Eligible Senior" memo for service providers. This memo describes a service provider's right to refuse a meal to an eligible senior because of the senior's behavior. The person may be deemed to have inappropriate, disruptive, or dangerous behavior within either the congregate or home-delivered nutrition programs. The memo provides a means to allow the program to discharge the senior from the program.

The Senior Nutrition Program Handbook and Contractors Manual

The Senior Nutrition Program Handbook and Contractors Manual are excellent guidance materials for service providers. The documents contain all the components of the ENP detailed in a clear manner.

Title III E—Family Caregiver Support Program (FCSP)

Formal Health Care Affiliations with Family Caregiver Support Systems

Caregiver support services within Ventura County include several multifaceted systems with close formal health care affiliations that have evolved highly effective approaches for reaching out to fragile family support networks at the point when elders are at high risk of long-term care facility placement. Long Term Care Services of Ventura County, Inc., when providing Ombudsman guidance to families about care home placements, has assumed the additional FCSP Caregiver Support Services role on counseling families on community-based service alternatives. The Gold Coast CareGivers program of Livingston Memorial VNA Health Corporation works closely with its VNA case management team to arrange for FCSP respite for families initially being overwhelmed

with in-home care responsibilities following a hospital discharge. Home Remedies has established close working relationships with hospital discharge planners and enhanced their understanding of the benefits of minor home modifications to facilitate safe transfer back to the home.

Weekly Open Discussions for Families Considering Long-Term Care Options

As the State-appointed Long-Term Care Ombudsman, Long Term Care Services of Ventura County hosts and facilitates a discussion, each Friday, where family members receive technical guidance on how to obtain services through long-term care facilities. While placement may be the initial focus, the facilitator allows the discussions to address the emotional burdens associated with caregiving and guilt due to no longer being willing (or able) to meet a loved one's care needs. Exhausted and overwhelmed caregivers are linked to immediate caregiver support services, which often either delay or cancel placement plans.

Health Insurance Counseling and Advocacy Program (HICAP)

Medicare One-Stop Shopping

HICAP staff organized several Medicare Part D events during Open Enrollment Periods for those beneficiaries wishing to enroll in a Part D Plan or change plans. The events were strategically held throughout the County with at least two held at the AAA office. Events were set up with multiple computer stations staffed by counselors ready to help participants compare plans using the online Medicare Prescription Drug Plan Finder. Participants were given print outs or, when requested, enrollment assistance. Attendance at the AAA events reached 200 beneficiaries from all over the County.

Behavioral Health Part D Referrals

In response to the federal mandate for HICAPs to serve a portion of the population with mental health challenges, a partnership with County Behavioral Health Services was established. This partnership resulted in a direct referral system for persons who could benefit from advice on enrolling in a Medicare Part D Plan.

Linkages

Quarterly Home Visit Worksheet

Linkages staff use a multi-page worksheet for the quarterly home visit. This worksheet contains all of the elements of the assessment but is in checklist form. The worksheet provides the Care Manager with a comprehensive list of areas to review with their client.

Monthly Telephone Contact Progress Note

Current care plan information is entered into the progress notes in the form of a list to be reviewed during the monthly telephone contact. The care manager uses the list to ensure all aspects of the care plan are reviewed with the client.

Quality Assurance for Home Visits

The Linkages supervisor and/or the AAA Director accompany the Care Managers on home visits at least once a year to observe their interaction with clients.

TECHNICAL ASSISTANCE

One purpose of the monitoring visit is for CDA staff to provide technical assistance to AAA staff on specific program standards that did not rise to the level of a finding that would require formal corrective action. Detailed below is specific technical assistance provided during the monitoring visit.

Advisory Council

CDA staff reviewed the Advisory Council bylaws and discovered that the last step of the appeals process was to appeal to CDA. The last step in the appeals process should be to contact the AAA not CDA. CDA staff requested the last appeal step be changed when the bylaws are amended.

Fiscal Review

At the time of this review, the Fiscal Officer had only been on the job for a month and was not familiar with CDA's reporting requirements. Ms. Baucom and Mr. Perez spent considerable time providing training to Mr. Siazon using the Fiscal Officer's Handbook developed by CDA staff. During this time, Ms. Baucom and Mr. Perez explained the budget and monthly reporting requirements for Area Plan, Title V, and HICAP.

Title III B—Information and Assistance (I&A)

VCAAA was advised that the Senior Services Resource Directory should be available in Spanish. In addition, the VCAAA days and hours of operation should be clearly visible.

CDA staff encouraged VCAAA to promote Alliance of Information and Referral Systems (AIRS) certification of the I&A Representatives within the PSA. The following training resources were provided:

- Title 22 Regulations pertaining to I&A;
- National Association of State Units on Aging (NASUA) Support Center and Online Guide for Developing Aging Competencies for Information and Referral/Assistance Specialists;
- AoA's Vision 2010: Towards an Aging Information Resource System for the 21st Century;
- AIRS Assessment and Implementation Guide, and
- AIRS Standards for Professional Information and Referral.

The AAA was also encouraged to periodically conduct small, random customer satisfaction surveys and suggested the surveys include the following questions:

(1) How would you rate the service of Information and Assistance staff?

Very Helpful Helpful Fair Poor

(2) Were you able to access the program(s) you were referred to?

Yes No N/A

(3) If you needed Information and Assistance services again, how likely would you call the I&A program?

Very Likely Likely Unsure Unlikely Very Unlikely

(4) Do you have any additional comments?

CDA staff explained the benefits of using customer satisfaction survey results to demonstrate accomplishments and gain additional resources. The AAA could decide the sample size and if they wanted to conduct the survey over the telephone or by mail.

Title III C—Elderly Nutrition Program (ENP)

Sign In Sheets at Congregate Sites

Sign in sheets for the ENP should be used to verify an eligible person was served a meal. The “sign in” space at the Oxnard Wilson Senior Center was too small for participants to locate their preprinted name and sign. The space should allow them to sign either their name or initials, which are acceptable meal audit requirements. At this time, if volunteers recognize the senior they mark the form for them. The program staff must, at a minimum, obtain the signature or initials of the client monthly to assure the meals were provided to an eligible senior.

Guest Sign In Record

VCAAA staff was advised that Oxnard Wilson Senior Center should have a guest sign in process. There was no form available for guests to register, pay the guest fee, and be officially counted as having eaten a meal.

Use of Meal Tickets

Ensure the service provider discontinues the use of meal tickets at the Oxnard Wilson congregate meal site. Currently, when a senior makes a contribution, a volunteer hands them a meal ticket. This may be seen as a coercive action because it singles out seniors who do not or can not make a donation. This problem had been identified during a recent AAA site monitoring but had not been corrected at the time of the CDA visit.

Accounting Procedure for Donation Counting

Correct procedures for safeguarding contributions were not followed at the Oxnard Wilson Senior Center. Only one person was counting the donations. At least two people are required to count the donations that are placed in the lock box to ensure there is no theft and the count is verified.

Title III E—Family Caregiver Support Program (FCSP)

Public Information Materials to Promote FCSP

In order to reach fragile unpaid caregiver support networks before their collapse, the AAA must ensure that all FCSP service providers acknowledge on their websites and in their service brochures that these family members and friends are part of their service population and FCSP services are available. In addition, the AAA should ensure that

service providers do not infer in public information materials that it may have received CDA endorsement or approval as a result of being awarded a FCSP grant.

Title V—Senior Community Services Employment Program

Contract Language

A review of the AAAs contract with SER Jobs for Progress revealed that the service categories/units did not agree with the FY 2007/08 SCSEP performance measures. When updating the SCSEP contract, VCAAA should ensure that the contract reflects accurate service units/performance levels. In addition, the contract contains language in Article II – Program Budget and Payment Schedule Disclaimer Section that states Title V funds must be returned to the AAA and will be reallocated to another program. This practice does not apply to Title V funding as any unexpended funds must be returned to CDA. Therefore, the language pertaining to the reallocation of funds should be removed from the Title V service provider's contract.

Complaint Resolution Process

A review of SER's grievance procedure for applicants, employees, and participants did not include the AAA as the final authority for resolving complaints. The AAA should ensure that SER updates the current grievance procedure to include the AAA as the final authority in the complaint resolution process.

Support Services for SCSEP Participants

While meeting with the Case Manager Trainee at the Santa Paula One Stop Career Center, it became apparent that she was not familiar with all VCAAA services and programs, and how those services might benefit SCSEP participants. To increase awareness and access to VCAAA programs and services, it would be beneficial to conduct in-service training for the Case Manager Trainee and other One Stop Career Center Staff.

Data

A review of the FY 2007/08 second quarter Quarterly Progress Report and management reports revealed that follow-up had not been conducted on participants who exited the program, which resulted in the program not achieving their quarterly entered employment and retention goals. The VCAAA must ensure that SER's Case Manager Trainee conduct all follow-up on all exited participants and update SPARQ as needed to achieve their expected performance goals.

Income Eligibility

For the purposes of determining income eligibility for participation in SCSEP, the statute specifies the "Look-Back Period for Income" as the 12-month period prior to the application date or by counting annualized income for the 6-month period prior to the application date, which ever is more favorable to the applicant when determining eligibility. A review of SER's participant files showed that supporting documentation often was for an incorrect "Look-Back Period." The Case Manager Trainee was provided Technical Assistance during the onsite visit and advised of DOL's policy.

Alzheimer's Day Care Resource Center (ADCRC)

AAAs are required to use the Core Elements tool when monitoring the ADCRC program. VCAAA staff used the ADCRC Core Services list to monitor the ADCRC. VCAAA staff was informed that a Core Elements tool was available in the ADCRC Manual.

Linkages

Care Plans are well written and contain detailed information about the problem, goal, and intervention. Most care plan entries reviewed did contain status information in the "resolved/comments" section of the care plan; however, not all care plan entries included updated information. Care Managers should update the "resolved/comments" section for each care plan entry when information is available. This allows anyone reviewing the chart to have current information about the client and the services provided.

FINDINGS REQUIRING CORRECTIVE ACTION

Included below are the findings that led to the corrective actions detailed in the Report of Required Corrective Actions presented to AAA staff at the February 28, 2008, Exit Conference conducted by CDA. The Report of Findings and Corrective Actions sent to the AAA on April 18, 2008, is incorporated into this final report.

AAA Administrative Review

Procurement/Contract Process

California Code of Regulations (CCR) Section 7400(a)(2) specifies that the AAA shall establish a written grievance process for the disposition of complaints by older individuals or persons authorized to act on behalf of older individuals against the AAA's programs and employees or volunteers of such programs. VCAAA service provider contracts did not include a requirement for a written grievance process.

Corrective Action: Ensure all service provider contracts require a written grievance process for reviewing and attempting to resolve complaints of older individuals and residents of long-term care facilities.

Area Plan Achievement

CCR Section 7304 specifies parts of the area plan to be updated and submitted to CDA annually including needs assessment activities, objectives, service unit plans, budgets, etc. VCAAA does not have a system in place to ensure fiscal, program, and data staff participate in this process and therefore the area plan and updates may not be accurate.

Corrective Action: Ensure fiscal, program, and data staff collaborate in the development of the Area Plan.

Pursuant to CCR Section 7306(a), the AAA must submit an area plan amendment to the Department any time a major change occurs that affects its goals and/or objectives. Although VCAAA had followed the guidelines for amending their area plan, they did not submit the amendment to the Department for approval.

Corrective Action: Ensure an amendment is submitted to CDA when major changes or additions are made to the Area Plan objectives during the fiscal year.

Data Reporting

CDA's Standard Agreement, Exhibit E, Article II (C)(1-5), requires written, program specific reporting procedures. Although informal procedures are in place and VCAAA follows the "Q" Data Collection and Reporting System manual, there is no desk manual that contains written data collection and reporting procedures.

Corrective Action: Develop and maintain a written data collection/reporting procedures manual.

CDA's Standard Agreement, Exhibit E, Article II (E), states that the Contractor shall verify the accuracy of data submitted to CDA. CDA staff reviewed VCAAA data reports and discovered that some data elements were missing, and program staff are not verifying data prior to submission to CDA.

Corrective Action: Ensure NAPIS data submitted to CDA, to meet program reporting requirements, is verified for accuracy by each responsible program manager.

AAA Fiscal Review

Financial Reporting

OMB Circular A-87(B)(11)(h)(4) states "where employees work on multiple activities or cost objectives, a distribution of their salaries or wages will be supported by personnel activity reports or equivalent documentation." VCAAA provides direct Title III B Information & Assistance (I&A) and Outreach, Title III E I&A and Outreach, Title III C-1 Congregate Nutrition, and Title III C-2 Home-Delivered Nutrition services. Several staff work in multiple programs but do not track actual time spent in each separate activity.

Corrective Action: Ensure VCAAA staff working in multiple cost categories track actual time by program on timesheets.

AAAs must establish and maintain a financial reporting system that reflects accurate, current, and complete disclosure of the financial activities of the AAA and its service providers pursuant to 45 Code of Federal Regulations (CFR) Part 92.20(b)(1). The Nutrition service providers are combining costs for Title III C-1 and III C-2 on the monthly report submitted to VCAAA. The Fiscal Officer uses a percentage to distribute the costs between Title III C-1 and III C-2 when reporting to CDA. CDA staff reviewed the supporting documentation for expenditures reported on the September 2007 CDA 151 and the amounts did not agree.

Corrective Action: Ensure ENP service providers report monthly expenditures separately for Title III C-1 and III C-2.

Corrective Action: Ensure the supporting documents for monthly expenditures reconcile with amounts reported to CDA on the approved CDA 151 Monthly Financial Status Report.

CDA's Standard Agreements, Exhibit B, Article III, require AAAs to prepare and submit in electronic format a Detailed Expenditure Data File (SPR 107), a Request for Funds Data File (SPR 108), the Title III E Monthly Financial Status Report/Request for Funds (CDA 268), and the HICAP Detailed Expenditure Data File (CBSP 107) by the 30th of each month. AAAs must also report monthly NSIP meal counts on the SPR 107. For

the months of October through December 2007, VCAAA did not submit the required electronic files to CDA for processing and requesting of funds by the required due dates. In Fiscal Year (FY) 2006/07, required monthly fiscal reports were late numerous times.

Corrective Action: Submit expenditures and request for funds files and/or reports each month as required by CDA's Standard Agreement.

Corrective Action: Ensure NSIP meal counts are reported as required by CDA's Standard Agreement.

Budget Control

CCR Section 7318(h)(1) states the AAA is required to submit a schedule of paid personnel costs by position title, percentage of time, and salary/wages budgeted. In addition, the AAA must establish and maintain a financial reporting system that reflects accurate, current, and complete disclosure of its financial activities and that of its service providers pursuant to 45 CFR Part 92.20(b)(1). The annual wage rates listed for the Position Classifications in the FY 2007/08 HICAP Budget were compared to the annual wage rates listed for the same Position Classifications in the FY 2007/08 Area Plan Budget. The annual wage rates for the Management Assistant and the Fiscal Officer were not the same in each budget.

Corrective Action: Use consistent annual wage rates for AAA administrative staff on the personnel pages of the Area Plan and HICAP budgets.

Corrective Action: Ensure fiscal, program, and data staff collaborate in the development of the Area Plan Budget, HICAP Budget, and Title V Budget.

Specific Program Reports—Older Americans Act Programs

Title III B—Supportive Services (General)

Section 315(b)(4) of the Older Americans Act (OAA) requires AAAs to ensure that its service providers provide each participant with an opportunity to voluntarily contribute to the cost of a service; and clearly inform each participant there is no obligation to contribute and the contribution is purely voluntary. Further, Section 315(b)(3) of the OAA prohibits AAAs and service providers from denying an OAA service to any individual who does not contribute to the cost of a service. The AAA does not have a voluntary contributions letter to distribute to participants that explains these requirements.

Corrective Action: Develop a voluntary contributions donation letter for dissemination to Title III B program participants.

Corrective Action: Require service providers, when soliciting voluntary contributions, to inform all Title III B participants that services will not be denied to any participant who does not contribute to the cost of a service.

VCAA reported and budgeted Title III B Physical Fitness and Health Screening units of service under the Community Services/Senior Center Management Program in the FY 2007/08 Area Plan Update Service Unit Plan. CDA Title III Management Information Systems, Division 4000 Units of Service Measurements specifies that Physical Fitness and Health Screening units of service are allowable activities under the Health Program and must be reported as Health in the Service Unit Plan. In addition, funds allocated must be budgeted as Health on Page 8 in the Area Plan Budget (CDA 122).

Corrective Action: Report Title III B Physical Fitness and Health Screening units of service under Health in the FY 2008/09 Area Plan Update Service Unit Plan.

Corrective Action: Budget Title III B Physical Fitness and Health Screening as Health on Page 8 of the Area Plan Budget.

Title III B—Information and Assistance (I&A)

CDA staff discovered the I&A service provider is not consistently completing follow-ups and documenting outcomes of referrals when clients are linked to services. Although VCAA conducts follow-up on ten percent of its referrals, CCR Section 7537 specifies that I&A service providers shall follow-up on each referral to ascertain if the older individual's service needs were met.

Corrective Action: Ensure adequate staff resources are allocated to complete and document a follow-up outcome for each client that is referred to a needed service, within 30 days of the referral, to ascertain if the individual's service needs were met.

CCR, Section 7529(a) states in part that AAAs shall make I&A services available to all older individuals within the PSA, placing particular emphasis on linking services to isolated individuals and older individuals with Alzheimer's disease or related disorders, older individuals in greatest economic need, and older individuals in greatest social need. CDA staff discovered the client intake form was missing client age, client address, and unmet needs. Therefore it was difficult to determine if I&A services are provided to targeted populations as required.

Corrective Action: Modify the standardized I&A intake form to include client age, client address, and unmet needs.

Title III C—Elderly Nutrition Program (ENP)

CCR Section 7638.3(a)(4) specifies each home-delivered meal provider shall develop and implement criteria to assess the level of need for home-delivered nutrition services of each eligible participant and that reassessment of need shall be determined

quarterly. Such reassessment shall be done in the home of the participant at least every other quarter. Currently, there is no system in place to verify the quarterly assessments were completed in a timely manner. The “Q” Data Collection and Reporting System used by the VCAAA only documents when a record has been entered, not the date of the assessment or reassessment.

Corrective Action: Verify that all VCAAA home-delivered meal clients are assessed on a quarterly basis.

Section 315(b)(4) of the OAA requires AAAs to ensure its service providers provide each participant with an opportunity to voluntarily contribute to the cost of a service; and clearly inform each participant there is no obligation to contribute and the contribution is purely voluntary. At the Oxnard Wilson Senior Center congregate meal site, the donation sign read “suggested donation” but did not include the language that no eligible senior would be denied a meal for not contributing to the cost of the service. This language should be included with any request for donation.

Corrective Action: Ensure all requests for donations include a statement to clearly inform each participant there is no obligation to contribute, and the contribution is purely voluntary.

CCR Section 7634.3(d)(5) requires nutrition screening scores be accurately collected from all participants in compliance with CCR Section 7636.1(b)(7). CDA staff found that service providers are not conducting nutrition screening of participants at congregate sites in Ventura County.

Corrective Action: Ensure service providers conduct a nutrition risk screening on congregate meal recipients in accordance with federal requirements.

CCR Section 7638.9(e) states in part the service provider shall ensure that the amount of the eligible participant’s contribution is kept confidential. At the Oxnard Wilson Senior Center congregate meal site, seniors are required to reach over an opened file folder in front of the lock box to place their donation inside. This practice allows the 2 volunteers at the table and the seniors at the meal site to see the amount the senior is donating, which does not meet the requirement for confidential contributions.

Corrective Action: Ensure confidentiality of participant donations at the Oxnard Senior Center.

Title III E—Family Caregiver Support Program (FCSP)

Section 373(a) of the OAA states FCSP funds shall be used to ensure services are available for family caregivers of an older individual and grandparents or older individuals that are relative caregivers of a child. Since the AoA National Aging Program Information System (NAPIS) requires a distinction between “caregiver” and “grandparent” service delivery systems, the VCAAA’s budgeting, procurement, and

contracting processes specified in CCR Sections 7302 and 7354 must specify the applicable client to be served when contracting for services. VCAAA's FCSP contracts included both client groups as eligible service populations in Exhibit B, even though only one service provider was expected to serve "grandparents." The VCAAA's Area Plan Budget included funding for "Federal Funding Grandparent" equal to the amount allocated to Long Term Care Services of Ventura County, Inc., however this provider was not serving grandparents.

Corrective Action: Clarify within FCSP service provider contracts whether grandparents or other older relative caregivers of a child are to be served.

Section 373(e)(1) of the OAA requires the State to establish standards for the federal caregiver support service categories specified in Section 373(b) and then assure services are provided in accordance with these standards. CDA provides these specifications within its FCSP Services Matrix. VCAAA's RFPs released in April 2007 sought to procure 40 placement units under a non-existent category called "Caregiver Support Placement Counseling." In accordance with NAPIS requirements, CDA has placed Caregiver Counseling standards under the federal Support Services category and Care Receiver Placement under the federal Supplemental Services category. As a result, VCAAA is unable to accurately account for the costs and performance within these two federal service categories.

Corrective Action: Use the service categories and definitions contained in CDA's FCSP Service Matrix when contracting for Title III E services.

The FCSP Services Matrix allows FCSP funds be used to provide Case Management services to family members or friends experiencing diminished functioning capacities due to caregiver-related severe stress or depression, which temporarily interferes with care responsibilities. VCAAA's RFP released in April 2007 clearly sought this service. However, the grant application project description submitted by Senior Concerns identified a case management assessment focusing on frail adult concerns, such as daily living capacities, cognitive orientation, and alternative living options. The applicant also stated that FCSP funds would be used to expand its case management program. Since the selected application is made a part of the contract per CCR Section 7354(b)(13)(A), it is not clear whether the Senior Concerns FCSP clients are Title III E eligible caregivers or Title III B eligible frail elders.

Corrective Action: Ensure FCSP Case Management services provided by Senior Concerns assist Title III E eligible caregivers experiencing diminished capacities that impact caregiving responsibilities.

Section 373(e)(2) of the OAA requires data and records shall be maintained in order to monitor compliance with federal requirements and ensure performance accountability. Rather than specify a standardized format for FCSP client records, CDA has allowed AAAs to guide their FCSP service providers in evolving adequate data tracking and

performance accountability systems. Gold Coast CareGivers maintains client records that focus on the needs of the care receiver, rather than the caregiver. At Long Term Care Services of Ventura County, Inc., FCSP client information is maintained in staff spiral notebooks. Based on review of this documentation, it was not clear whether this agency was providing services that would be appropriately documented as an I&A record or as a comprehensive caregiver client services record. Home Remedies reported caregiver assessed needs were maintained to memory and not documented. This service provider was also not aware of the additional eligibility criteria required to receive FCSP Supplemental Services.

Corrective Action: Document the following in each FCSP client record:

- Caregiver and care receiver profile/eligibility data;
- Assessed need of caregiver for services;
- FCSP and other services to meet assessed caregiver needs;
- Additional criteria met for respite and supplemental services;
- Evidence of provision of all FCSP-funded services (both Title III E and matching); and
- Follow-up on caregiver status, service effectiveness, and changing needs.

CCR Section 7352, Procurement ties an AAA's RFP to the subsequent service provider contracts. VCAAA's RFPs released in April 2007 clearly sought In-Home Respite Services. However, in the application submitted by Gold Coast CareGivers, the budget detail identified that 10 percent of the federal share of FCSP personnel costs would pay for the agency's VNA Outreach Specialist to provide FCSP related Outreach. Since this application and budget became part of the contract per CCR Section 7354(b)(13)(A), the service provider assumed this was an appropriate use for federal Title III E funds.

Corrective Action: Clarify if Title III E funds are intended to be used by Gold Coast CareGivers to fund FCSP Outreach.

Section 315(b)(4) of the OAA requires AAAs to ensure its service providers provide each participant with an opportunity to voluntarily contribute to the cost of a service; and clearly inform each participant there is no obligation to contribute and the contribution is purely voluntary. Each of the visited FCSP service providers was asked about the voluntary contributions procedures. The FCSP service provider brochures and donation requests did not conform to this federal expectation, and it was not clear whether the materials FCSP service recipients received contained a donation request. Although not in writing, the Home Remedies service provider's example of verbal communication for donations met federal requirements.

Corrective Action: Require service providers, when soliciting voluntary contributions, to inform all Title III E caregivers that services will not be denied to anyone who does not contribute to the cost of a service.

Section 315(b)(3) of the OAA prohibits the AAA and its service providers from utilizing a “means test” such as a sliding scale assessment of share of costs in collaboration with Title III services (including FCSP) because such actions could be misinterpreted as a required payment. The Home Remedies service provider utilized a standardized customer order triplicate form commonly used in private business to document minor home modifications to be performed and their associated costs. In reviewing just one order form, # 560682 referenced that “Balance (was) Paid by Family.” It is not clear if the family caregiver received a copy of this order, but the FCSP service provider did not maintain any other documentation that would have been provided to the consumer that clearly outlined the mutually agreed-upon minor home modifications.

Corrective Action: Ensure the Home Remedies’ written orders for Home Modifications are not construed as a bill for consumer share of costs.

Section 373(e)(2) of the OAA requires the State to collect certain minimum data in a standardized format specified by AoA. AoA NAPIS reporting requirements address specific service performance measures and client profile criteria for NAPIS registered services. VCAAA contracted with Long Term Care Services of Ventura County, Inc., to provide a registered service with Title III E funds. In addition, a review of AAA data maintained for this service provider revealed that the number of clients served was always equal to total counseling hours performed, which is not reasonable for this service. During the site visit the Executive Director acknowledged that service performance hours were not tracked, nor was minimum caregiver and care receiver profile data collected for the registered service.

Corrective Action: Ensure Long Term Care Services of Ventura County documents and reports total hours of service when providing FCSP counseling.

Corrective Action: Require Long Term Care Services of Ventura County to document and report federally required annual profile data when providing a registered service.

Section 373(e)(2) of the OAA requires that data and records shall be maintained in order to monitor compliance with federal requirements and ensure performance accountability. For the first four months of FY 2007/08, VCAAA reported the expenditure of over 25 percent of its federal share of funds budgeted to directly provide Caregiver Outreach services. According to the FCSP Service Matrix, this service consists of interventions initiated by an agency for the purpose of identifying potential caregivers and encouraging their use of existing caregiver services. Performance units are measured by individual, one-on-one contacts between the service provider and a caregiver. The first two Quarterly Service Reports submitted to CDA for FY 2007/08 conveyed 3,684 direct service contacts. However, the AAA Director was not familiar with the provision of this Title III E funded direct service and was not able to produce any documentation to account for the reported performance.

Corrective Action: Ensure performance documentation is maintained for the direct provision of FCSP Outreach.

Title V—Senior Community Service Employment Program (SCSEP)

CDA's Title V Standard Agreement, Exhibit A, Article II (4), states that the AAA shall monitor and evaluate contract compliance of the service provider using the monitoring tool which contains the SCSEP core elements. A review of the provider contract file revealed that an annual program monitoring had not been completed of the SCSEP service provider.

Corrective Action: Conduct annual onsite monitoring of the SCSEP service provider using CDA's monitoring tool to ensure all core elements are reviewed.

20 CFR Part 641.535(a)(8) states that participants will be provided wages and fringe benefits for time spent in assigned community service employment activities. A review of participant files and timesheets revealed participants were not paid for their time spent in orientation, assessment, and Individual Employment Plan (IEP) development.

Corrective Action: Ensure SER Jobs for Progress pays SCSEP participants for time spent in orientation, assessment, and Individual Employment Plan development.

20 CFR Part 641.812(a) requires grantees to expend SCSEP funds during the fiscal year for which they are awarded (July 1-June 30). A review of the Title V/SCSEP expenditure worksheet revealed that as of February 2008, the project had expended 77 percent of the funds budgeted in the Participant Wage and Fringe Benefit category. This high level of spending could create a deficit in funds for the remainder of the fiscal year and result in a disruption of service to participants.

Corrective Action: Ensure SCSEP expenditures are monitored monthly, and require SER Jobs for Progress to adjust program activities as appropriate.

In FY 2006/07, the VCAAA, SCSEP Project was unsuccessful in achieving two of the required Performance Goals, Retention in Unsubsidized Employment and Service to the Most-in-Need. 20 CFR Part 641.790(b) requires any grantee that fails to meet its performance levels to submit a corrective action plan.

Corrective Action: Require SER Jobs for Progress to develop and submit a Corrective Action Plan to VCAAA by April 15, 2008, to address how performance goals will be achieved in FY 2007/08.

20 CFR Part 641.535(a)(2) states participants must be assessed no less frequently than two times during a twelve-month period. A review of participant files revealed that semi-annual assessments of participants are not performed.

Corrective Action: Ensure that SER Jobs for Progress conducts semi-annual assessments of participants' skills, interests, abilities, and training needs and update the Individual Employment Plan, as appropriate.

Specific Program Reports—Older Californians Act Programs

Linkages

Section 4.A.1 of the Linkages Program Manual allows sites a caseload variance of 20 percent of the required monthly caseload count of 100. A review of the Linkages Self Assessment tool indicated that the Active Monthly Caseload had fallen below the required 80 clients for the last 19 months. If the Active Monthly Caseload falls below the 20 percent allowance for two consecutive months, a written Corrective Action Plan must be submitted to CDA. At the time of this onsite review, a Corrective Action Plan had not been sent to CDA. The Linkages Supervising Care Manager reported that staff turnover, staff out on leave, and client deaths have contributed to the fluctuation of the active monthly caseload. In order to comply with the Linkages Manual, the AAA must provide a Corrective Action Plan to CDA by April 1, 2008.

Corrective Action: Ensure that a Corrective Action Plan is provided to CDA when the monthly caseload falls below the 20 percent allowance for two consecutive months.

Corrective Action: Provide a Corrective Action Plan to CDA by April 1, 2008, that addresses the current caseload which is below the required 20 percent allowance.

Section 6 of the Linkages Program Manual requires the client approve the care plan by phone or in writing and the approval be documented in the progress notes. Care Management services are voluntary and a client's consent must be obtained before services can begin. During a chart review, CDA staff found no indication that the client had approved the care plan.

Corrective Action: Obtain client approval for the care plan by phone or in writing and record in the progress notes.

The VCAAA Linkages Program uses computerized progress notes to document services provided to clients. The progress notes are printed out and placed in the client's chart. Each entry contains the care manager's name. However, the progress notes in the chart do not contain the signature and title of every person who has made an entry. A Frequently Asked Question (available on the CDA website) regarding computerized progress notes directs Linkages Program staff to sign their name with the initials of their credential or title at the bottom of each

progress note page. (Note: this requirement will be included in the current revision of the Linkages Manual.)

Corrective Action: Ensure all computerized progress note entries are dated and initialed by the care manager and signed with professional initials at the bottom of the page by all care managers making entries.

Section 6 of the Linkages Manual specifies Care Planning provide a focus for the needs identified in the functional assessment; organize the delivery system to the client; and help to assure the service delivered is appropriate to the problem. During a chart review, Ms. Hendrickson found that the care plan had been developed but services were not arranged until two months later. Many new Linkages clients are in crisis and need immediate assistance to avoid placement in skilled nursing.

Corrective Action: Ensure that all services are arranged or purchased in a timely manner.

Section 9 of the Linkages Manual states all documents contained in the case record required by either the provider or AAA/Department must be complete, including name (signature) of the person responsible for the completed form. CDA staff reviewed an assessment completed for a client and found that the care manager and the supervisor had not signed the assessment.

Corrective Action: Ensure that the Assessment is signed and dated by the care manager and the supervisor.

Health Insurance Counseling and Advocacy Program (HICAP)

The VCAAA HICAP does not meet the statewide staffing standards for HICAP as established in CDA Program Memo (PM) 99-18 (P) which requires that every local HICAP is staffed with a minimum of a half-time Volunteer Coordinator or Outreach Coordinator. This standard is amplified and updated in PM 05-14 (P) HICAP Augmentation which requires local HICAPs to use the \$2 million legislative augmentation to “add non-volunteer, paid staffing to each HICAP’s local infrastructure.”

The VCAAA HICAP has a full-time position that has been vacant since 2005. HICAP “paid” staff consists of the Program Manager and a part-time staff person that also works in VCAAA’s I&A program. Duties of this shared position include data input, counseling clients on drug plan comparisons, limited outreach to Spanish speaking Medicare beneficiaries, and answering HICAP telephone calls from Spanish speaking callers. In lieu of filling the vacant position, VCAAA uses temporary employees from the County employment agency to assist with core HICAP functions (i.e., assisting counselors in the field with accessing drug plan comparison material from the Medicare

Prescription Drug Plan Finder and Comparison tool, assisting with appointment setting for counselors, and inputting data from the field in order to complete aggregate reports submitted to CDA).

Corrective Action: Expedite hiring to fill the vacant full-time HICAP position, and assign duties to support HICAP operations as appropriate.